

NTELOS Inc.

401 Spring Lane Plaza, Waynesboro, VA 22980

Annual 47 C.F.R. 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 25, 2010

Names of Companies Covered by this Certification:

NTELOS Inc. is the holding company for the following affiliated companies:

<u>Company</u>	<u>499 Filer ID</u>
NTELOS Telephone Inc.	807075
NTELOS Network Inc.	807076
NTELOS of West Virginia	807074
Virginia RSA 6 LLC	807081
Roanoke and Botetourt Telephone Company	807819
R&B Network, Inc.	807820
The Beeper Company	807821
Virginia PCS Alliance L.C., (includes Richmond 20 MHZ, LLC) dba NTELOS	816030
West Virginia PCS Alliance L.C., dba NTELOS	818784

Name of signatory: Mary McDermott

Title of signatory: Senior Vice President – Legal and Regulatory Affairs

I, Mary McDermott, certify that I am an officer of NTELOS Inc. and the affiliated companies named above (collectively and individually “Company”) and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission (“Commission”). *See* 47 C.F.R. 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company’s procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission’s rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2009 or related to 2009. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

NTELOS Network Inc. (NTELOS’ Virginia CLEC) received a FCC Enforcement Bureau Inquiry (File No. EB-09-TC-424) on August 25, 2009 concerning the practices and procedures in place regarding CPNI for the period from January 1, 2008 to the date of the Inquiry. NTELOS Network Inc. responded to the Inquiry on September 25, 2009 and included a detailed description of NTELOS’ policies and procedures for protecting our customers’ information. Since the Inquiry was not specific to any complaints or issues, NTELOS described two possible incidents that may have been the CPNI-related issues brought to the Enforcement Bureau’s attention. This Inquiry is still pending at the FCC Enforcement Bureau.

In December 2009, an incident occurred with Virginia PCA Alliance, L.C. (NTELOS' Virginia Wireless Company) in which a wireless customer's CPNI was disclosed to a third party without the customer's permission. On January 20, 2010, the customer filed a formal complaint with the FCC (FCC IC# 09-C00182446-1) and, on January 21, 2010, a formal complaint with the Virginia State Corporation Commission (Customer ID# Gree8633). Upon investigation, we found that NTELOS' CPNI procedures were not followed in this case by the Customer Care Representative (CCR) involved. We concluded that it was a training issue and the CCR did not intentionally disclose the customer's information. NTELOS is reviewing and updating our CPNI procedures and guidelines to ensure that these are understandable for our employees. We are also reviewing our training to ensure that employees are periodically reminded of the importance of following the CPNI rules. On February 9, 2010, NTELOS responded to the complaints filed at the FCC and SCC.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

Signed

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Attachment

NTELOS Inc.
401 Spring Lane Plaza, Waynesboro, VA 22980

2009 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
February 25, 2010

This statement accompanies the Company's 2009 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009 (e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. See 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

NTELOS has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

NTELOS has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

NTELOS has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

NTELOS has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

NTELOS does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, NTELOS will initiate the notification and Opt-Out process. NTELOS does not provide CPNI to other parties and thus has not used the opt-in approval process. NTELOS has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, NTELOS will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6. Record of Customer CPNI Approval/Non-Approval

At such time as NTELOS may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, NTELOS will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

NTELOS has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

NTELOS provides customers with on-line access to customer account information for which NTELOS has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

NTELOS has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

NTELOS has implemented procedures to notify customers of account changes.

8. Auctions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, NTELOS makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

No actions taken against data-brokers.

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9. Disciplinary Process

NTELOS has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009 (b).

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, NTELOS will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

NTELOS has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.